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September 7, 2007

Mr. Sergio Bosques
Regional Storm Water Coordinator
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region II
Centro Europa Building, Suite 417
1492 Ponce de Leon Ave.
San Juan, PR 00907-4127

NOTICE OF INTENT - NPDES GENERAL PERMIT FOR THE MUNICIPALITY OF DORADO MS4 PHASE II STORM WATER PROGRAM

Dear Mr. Bosques:

As requested in the provisions of the Clean Water Act, as amended, we are hereby submitting our Notice of Intent (NOI) to seek coverage under the NPDES general permit PRR040000, which applies to regulated small municipal separate storm sewer systems (MS4s) in urbanized areas. This NOI includes preliminary information which will be further elaborated in a storm water management program to be submitted on or before the due date of January 18, 2008.

Sincerely,

Hon. Carlos López Rivera Mayor

Municipality of Dorado



CERTIFICATION

"I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Hon. Carlos López Rivera

Mayor

Municipality of Dorado

Notice of Intent

National Pollution Discharge Elimination System (NPDES) General Permit PRR040000 Regulated Small Municipal Separate Storm Sewer System (MS4) Municipality of Dorado

-) The government of the Municipality of Dorado operates a municipal separate storm sewer system located in the urban areas of Dorado, Puerto Rico.
- 2) The name, mailing address and telephone numbers of the MS4 operator is:

Hon. Carlos López Rivera Mayor Municipality of Dorado PO Box 588 Dorado, PR 00646

Tel: 787-796-1230 Fax: 787-796-3660

- 3) The Standard Industrial Classification (SIC) Code for the operator is 9199, which applies to public administration / general federal, state or local government activities.
- 4) In addition to the primary administrative contact, who is the Hon. Mayor Carlos López Rivera, the primary technical staff contact is:

Mrs. Dora Martínez Director of Project Programming and Management Municipality of Dorado PO Box 588 Dorado, PR 00646

Tel: 787-796-1230 x. 345

- 5) The Municipality of Dorado is currently gathering the list of all the discharge permits approved for its municipal projects. As of today, the only information available is the following:
 - a. Plan CES 323-04 Reconstruction of sidewalks and curbs, and the remodeling of an existing commercial structure in the Dorado urban center
 - b. Plan CES 05-26-0479-OC Remodeling of the Tomás Palmares Park, located on Dorado's Industrial Street
- 6) The Municipality of Dorado does not have a graphical database depicting the location of its existing storm sewer system. This map will be created and submitted, along with the storm water management program, on or before

January 18, 2008. This date marks the end of the 180 day limit established by the NPDES Permit No. PRR040000. Even though the municipality lacks such a map, there are maps of proposed storm sewer projects that are about to begin or are currently beginning construction. The maps for the Channeling of the "Chorro de Maguayo" and the Storm and Sanitary Sewer for the Costa de Oro Area are included as Appendix A.

7) The Municipality of Dorado covers an area of approximately 15,489 cuerdas, of which only an estimated 35% (around 5,500 cuerdas) are considered urban areas. According to the 2000 Census, the government of Dorado served a population of approximately 34,017 habitants, which was projected to be around 35,442 on 2007.

The local government structure is aimed at providing the basic local services to all of the Dorado residents. Services include, among others, the following: health services, infrastructure maintenance, solid waste collection and disposal, industrial development, tourism development and support, low income housing development, etc.

The Municipality of Dorado is within the La Plata River water basin, and has a shoreline of approximately 13.5 kilometers facing the Atlantic Ocean. The majority of its storm waters drain towards the La Plata River, which shortly reaches its final destination in the Atlantic Ocean. The MS4 of the Municipality of Dorado contains a wide arrange of discharges, including existing residential, commercial, industrial, agricultural and tourist developments, along with ongoing constructions for a variety of similar uses. An estimate of the MS4 capacity is currently unavailable.

- 8) The Municipality of Dorado covers a total area of 23.5 square miles. Of these, approximately 8.35 square miles are considered to form the MS4 area.
- 9) The description of the Best Management Practices (BMPs) to be implemented by the Municipality of Dorado for each of the six storm water minimum control measures are included as Appendix B. These will be elaborated further as part of the storm water management program.
- 10) The descriptions of the measurable goals for each BMP, including the months and years in which the action will be taken, interim milestones and the frequency of the action, will be elaborated within the storm water management program due on January 18, 2008.
- 1 The person responsible for implementing or coordinating the storm water management program is:

Mrs. Dora Martínez
Director of Project Programming and Management
Municipality of Dorado

PO Box 588 Dorado 00646

Tel 787 796-1230 345

Appendix B

Description of the Best Management Practices

PUBLIC EDUCATION AND OUTREACH

Objective: The Municipality will educate the general public by making 1,000 impressions per year with a storm water quality message via print, or other appropriate media.

1 BMP: Prepare storm water education materials for citizens

Goal: Prepare outreach material on proper storm water management practices for citizens.

Storm water management practices that can be recommended include:

- Avoid blocking existing channels made for storm water flow.
- Avoid leaving construction materials, such as sand and gravel, unprotected from storm water flows. Always place construction materials in a flat area where vulnerability to being swept away by storm waters is minimal.
- Always clean up debris around the house in order to avoid it being swept away into storm water drains.
- Periodically clean storm drains in order to prevent blockages.
- 2. BMP: Prepare storm water education materials for citizens on management of household hazardous wastes

Goal: Prepare outreach material on proper household hazardous waste management practices for citizens.

Household hazardous waste management practices that can be recommended include:

When residents store paint, they should tightly seal the paint can and tore it upside-down so that the paint will form a seal around the lid.

- Paint should also be kept in dry areas away from sparks or flames.
- Pesticides should be stored in a dry area in their original containers with the labels intact. They should be stored in a separate, locked cabinet or other secure structure, away from children and pets, food, medical supplies, cleaning products, heat, flames or sparks.
- Citizens should also be made aware of the proper use of hazardous materials, especially how much to use and how to avoid releasing materials into the environment.

- To minimize the disposal of hazardous products, it is important that citizens know that it is best to use only those products that are absolutely necessary and to use the nontoxic alternatives whenever possible.
 - Household hazardous wastes should not be flushed down the drain because these drains lead to either a home septic system or a municipal treatment plant, neither of which has adequate capability to remove hazardous chemicals from wastewater.
- They should also be informed that hazardous products used at home should never be poured into the ground, gutters, or down storm drains, where they eventually enter storm sewers and are transported untreated into nearby water bodies.
- Start a hazardous waste disposal and recycling center, and consider establishing hazardous waste collection days when hazardous products are collected from homes and taken to an approved facility for disposal. The municipality must make the effort to inform its citizens of the hours and locations of such sites and what materials are being recollected.

3. BMP: Prepare trash management education material

Goal: Prepare outreach material on proper trash management practices for citizens.

Trash and floating debris in waterways have become significant pollutants, especially in areas where a large volume of trash is generated in a concentrated area.

Control strategies for trash will consider the following points:

- Implement a control structure designed to target the most prevalent types of trash and identify the source or sources of the trash.
 - Develop a budget that takes into consideration what services and facilities are already available and can be utilized at the lowest cost.
- Regular cleaning and maintenance are necessary to prevent the accumulating trash at control structures.

Citizens should be informed about the environmental consequences of littering.

There are two main methods of trash control: source control and structural control. There are four main techniques for source control: community

education, improved infrastructure, waste reduction, and cleanup campaigns.

Community education, such as informing residents about their options for recycling and waste disposal, as well as the consequences of littering, can instill a sense of citizen responsibility. Flyers, door hangers, magnets, and bumper stickers are some of the ways to educate the public. These materials can be distributed through the mail, at public places in schools, and at local businesses.

Improved infrastructure includes optimizing the location, number, and size of trash receptacles and recycling bins on expected need. Communities that allow private trash disposal companies to serve the public should work with these companies to ensure that the community's trash management goals are reached.

Waste reduction includes encouraging the purchase of products with less disposable packaging as well as encouraging manufacturers to reduce the amount of packaging they use. Again, some methods of distilling this information include flyers, magnets, and using the community's web page.

Cleanup campaigns are an effective way to reduce trash. There have been many successful cleanup programs at beaches, along rivers, and in parks. By keeping track of what is being collected, the sources of the trash can be quantified and targeted for improves source reduction. Municipal projects such as street sweeping, receptacle servicing, and using cleanup crews along roadsides can also be effective in preventing trash from accumulating and entering waterways. Finally, specially designed boats are effective at removing floating trash and other debris from rivers, lakes, beachfronts, bays, and harbors.

The second method of trash control, structural control, includes physical filtering structures and separation. Physical filtering structures, such as trash racks, mesh nets, bar screens, and trash booms, concentrate diffuse, floating debris and trash and prevent it from traveling downstream.

4. BMP: Prepare education / outreach material for commercial activities

Goal: Prepare education / outreach material for commercial activities.

Industries and businesses can be a very influential component of the watershed. Many commercial activities contribute to storm water pollution (such as vehicle washing, landscape fertilization, and improper hazardous waste disposal).

Materials designed for businesses can include posters, magnets, calendars, flyers, brochures, and best management practices (BMPs) fact sheets or handbooks. Some commonly recommended BMPs for commercial activities include:

- Good storage practices
- Waste management
- Vehicle and equipment washing
- Spill prevention and cleanup
- Property maintenance
- Training and education for employees and customers
- Eliminating improper discharges to storm drains
- Trucking and shipping / receiving
- Redesigning parking and landscaped areas to include storm water management features (i.e. rain gardens, bioretention areas, collection areas for roof runoff, and shared parking)
- Promptly cleaning up vehicle leaks
 Using a rag or absorbent material to properly dispose of automotive fluids
- Regularly sweeping the parking lot unless a mop for spot cleaning is used
- Disposing of the mop water to a sanitary sewer
- Rinsing the parking lot with water only (no soap) after first sweeping
 it up and cleaning up oil spots with an absorbent, or collecting the
 soapy rinse water ad pumping it to the sanitary sewer.

5. BMP: Develop incentives for businesses that participate in pollution prevention activities

Goal: Provide assistance, incentives, recognition, etc. for businesses that actively participate in pollution prevention activities.

A municipality can choose to establish a better business program, which provides assistance, incentives, and recognition for businesses that use practices to effectively reduce storm water pollution. Some programs target all businesses in the community, whereas others focus on a specific industry, such as automotive shops, power washers, and carpet cleaners.

6. BMP: Prepare classroom education on storm water pollution management

Goal: Prepare classroom education material for distribution to local schools.

Providing storm water education through schools exposes the message not only to students, but to their parents as well.

Municipalities should work with school officials to identify their needs. Municipalities can provide educational aids that range from simple photocopied handouts, overheads, posters, and slide shows to more costly and elaborate endeavors, such as working models and displays.

PUBLIC INVOLVEMENT / PARTICIPATION

Objective: Involve stakeholder groups, including the municipal government, businesses, and citizens, in making decisions about storm water management priorities and programs.

BMP: Establish a NPDES storm water steering committee

Goal: The NPDES Storm Water Steering Committee is established and meets regularly during the permit term. Membership includes representatives from the Municipality, public, industrial and commercial groups, and construction / developer groups.

2. BMP: Hold public meetings to receive input on the proposed program

Goal: Three public meetings will be held on the Municipality's proposed storm water program.

ILLICIT DISCHARGE DETECTION AN ELIMINATION

Objectives: Develop a comprehensive map of the storm water drain system, establish and carry out procedures to identify and remove illicit discharges, establish legal authority for enforcement actions, and encourage public education and involvement in eliminating illicit discharges.

BMP: Storm drain system map

Goal: Develop a storm drain system map

A comprehensive infrastructure map of the MS4 will aid the municipality in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth inspection and monitoring, and will help coordinate management activities to remove illicit connections and track storm drain system maintenance.

2. BMP: Identify illicit connections through dry weather screening

Goal: A survey during dry weather of the storm drain system outfalls will be conducted to identify non-storm water flows. Areas with suspicious discharges will be further inspected to detect suspected direct connections to the wastewater system and identify areas where wastewater might be leaking into adjacent storm drain pipes.

3. BMP: Illicit discharge / illegal dumping hotline

Goal: A hotline for citizens to report illegal dumping and suspicious discharges will be established in the municipality. The hotline will be advertised by placement of one ad in the local newspaper every 6 months and distributed to homeowners and businesses every year.

CONSTRUCTION SITE RUNOFF CONTROL

Objective: Establish a set of minimum erosion and sediment control (ESC) requirements for construction sites, including planning, installation, inspection, and maintenance of ESC practices.

BMP: Require ESC plans for projects with land disturbance

Goal: A draft ordinance and guidance will be prepared, and after review by the applicable parties, a final ordinance and ESC guidance will be issued.

2 BMP: Require the use of appropriate perimeter controls on construction sites

Goal: ESC requirements will be revised to require all construction sites on slopes and in areas where calculations indicate pooling of water behind the structure to use steel-reinforced silt fencing. Additional requirements include proper installation and maintenance of these and other perimeter controls.

3 BMP: Develop an education program for contractors

Goal: Educate contractors about the proper selection, installation, inspection, and maintenance of BMPs to ensure compliance with ESC requirements.

POST CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT / REDEVELOPMENT

Objective: Reduce the volume and improve the quality of storm water runoff by disconnecting impervious surfaces and installing and maintaining structural storm water controls.

BMP: Develop a program for maintenance of structural storm water controls

Goals: Conduct an inventory of structural runoff controls. Integrate the location of these controls with schedules for regular inspection and maintenance. Conduct two inspections of each structural control per year and conduct regular maintenance as prescribed for each type of practice.

2. BMP: Develop and implement a storm water ordinance and guidance or a design manual that includes performance standards designed to control runoff impacts

Goal: Construction activities in the municipality will be issued descriptions and plans regarding storm water control practices and site designs that comply with the criteria and guidance specified or referenced in the municipal code.

POLLUTION PREVENTION / GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Effective storm water management programs should start with municipal employees. Municipal crews can be educated about the impacts of their work on storm water quality to prevent pollution from municipal operations. Also, municipal crews can set a good example for citizens.

Objective: Reduce the amount of nutrients entering receiving waters through education of municipal employees about lawn care activities, spill prevention and control, and vehicle washing.

BMP: Training program for grounds maintenance and landscaping crews

Goals: Develop a pollution prevention workshop for all municipal employees responsible for grounds maintenance and landscaping at public facilities. Once per year, hold an additional workshop for new employees and crew managers.

2. BMP: Develop spill prevention and control plans for municipal facilities

Goals: Develop plans describing spill prevention and control procedures. Conduct annual spill prevention and response training sessions for all municipal employees. Distribute educational materials, e.g. posters and pamphlets, to each municipal facility.